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January 15, 2018

Arthur Burbank  
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Subject: Quarterly Progress Report – CERCLA Projects, Smoky Canyon Mine  
Pole Canyon 2006 NTCRA (Water Management)  
Pole Canyon 2013 NTCRA (Cover System)  
Remedial Investigation/Feasibility Study

October through December 2017 (Fourth Quarter of 2017)

Dear Art,

This quarterly progress report describes work performed and identifies deliverables and data transmittals for the quarter from October through December 2017, along with upcoming activities, associated with the following CERCLA projects at the Smoky Canyon Mine:

- Pole Canyon 2006 Non-Time-Critical Removal Action (NTCRA) Effectiveness Monitoring and Performance Evaluation (Water Management)
- Pole Canyon 2013 NTCRA Effectiveness Monitoring and Performance Evaluation (Cover System)
- Remedial Investigation/Feasibility Study (RI/FS)

#### **Work Performed, Including Deliverables and Data Transmittals**

##### **Pole Canyon 2006 NTCRA Effectiveness Monitoring and Performance Evaluation (Water Management)**

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Effectiveness monitoring activities for the Pole Canyon 2006 NTCRA are conducted pursuant to the *2006 Settlement Agreement/Statement of Work for Non-Time-Critical Removal Action*. The following monitoring was conducted from October through December 2017 in accordance with the *Pole Canyon 2006 NTCRA Effectiveness Monitoring Plan (EMP)*, Rev. No. 4:

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- Water levels were monitored and recorded continuously at five Wells Formation monitoring wells (GW-16, GW-18, GW-24, GW-25, and GW-27) and three alluvial monitoring wells (GW-15, GW-22, and GW-26).
- Flow was monitored and recorded continuously at surface water monitoring stations LSS and LP-1 and upgradient from the infiltration basin (station UP-IN)



on the west side of the ODA. Also, flow was monitored continuously at the pipeline inlet (UP-PD) and outlet (LP-PD) structures, with telemetry access available at both locations for regular tracking of transducer measurements.

- A formal inspection of the bypass pipeline, infiltration basin, and the run-on control channel was completed on November 14, 2017 as required by the Post-Removal Site Control (PRSC) Plan (2009) for the 2006 NTCRA.
- Fourth-quarter surface water monitoring was conducted on November 13-15, 2017 at the following locations:

UP-PD	LSV-3	LSS-SP0
UP-IN	LSV-4	LSS-SP-S1
LP-PD	LSS	LSS-SP-S2
LP-1	HS	LSS-SP-N1
NSV-5	HS-A1	LSS-SP-N2
NSV-6	HS-A2	LSS-SP-N
LSV-1	HS-C1	CC-WY-01
LSV-2	HS-3	

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- Fourth-quarter groundwater monitoring was conducted on November 13-29, 2017 at the following locations:

GW-15	GW-24
GW-16	GW-25
GW-18	GW-26
GW-22 (2 depths)	GW-27

Attached are preliminary, raw field and laboratory data compiled since the last progress report for the Pole Canyon 2006 NTCRA effectiveness monitoring activities. The raw data include the fourth-quarter 2017 monitoring results.

Simplot submitted the *Final 2016 Annual Effectiveness Monitoring and Performance Evaluation Report for the Pole Canyon Non-Time-Critical Removal Action (NTCRA)* to the Agencies on December 7, in follow up to an Agency comment provided on November 21.

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Pole Canyon 2013 NTCRA Effectiveness Monitoring and Performance Evaluation (Cover System)

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Activities associated with the Pole Canyon Cover System NTCRA are conducted under the *2013 Administrative Settlement Agreement and Order on Consent/Consent Order (ASAOC) for Non-Time-Critical Removal Action*. Minor repairs were made to the cover system in follow up from the fall inspection (conducted on September 12). The status for deliverables includes:

- The *Final Post-Removal Site Control (PRSC) Plan*, including *As-Built Drawings*, was approved by the Agencies as final on November 21.
- *EMP Revision No. 5* was submitted to the Agencies on December 11. Note that *EMP Revision No. 5* is a combined monitoring plan for both Pole Canyon ODA NTCRAs. It includes the new monitoring requirements associated with the 2013 NTCRA cover system as well as monitoring requirements associated with the 2006 NTCRA. *Revision No. 5* also includes plan improvements identified since *Revision No. 4* was submitted.

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#### Remedial Investigation/Feasibility Study

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Simplot submitted a revised memorandum regarding copper concentrations in small mammals to the Agencies on December 15 in follow up to Agency comments provided on November 21.

Simplot submitted responses to Agency comments (September 8) on the *Revised Draft FS Technical Memorandum #1, Development and Screening of Remedial Alternatives* on November 16.

Preparation and testing of the Phase 2 Ultra-Filtration/Reverse Osmosis and Fluidized Bed Bioreactor (UF/RO+FBR) water treatment system at Hoopes Spring continued. The Agencies approved Simplot's August 10 submittal of *Addendum 01 (Biosolids Dewatering)* to the *Final Phase 2 Pilot Study Work Plan and Sampling and Analysis Plan, Ultra-Filtration/Reverse Osmosis and Biological Selenium Removal Fluidized Bed Bioreactor Treatment Technology* on October 23.

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#### **Upcoming Activities**

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#### Pole Canyon 2006 NTCRA Effectiveness Monitoring and Performance Evaluation (Water Management)

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- Conduct first-quarter (winter) 2018 surface water sampling at locations identified in Table 4-2 of the *Pole Canyon 2006 NTCRA EMP Rev. No. 4*.
- Ongoing continuous flow monitoring at LSS, UP-PD, UP-IN, LP-PD, and LP-1.
- Ongoing continuous water-level monitoring at five Wells Formation monitoring wells (GW-16, GW-18, GW-24, GW-25, and GW-27) and three alluvial monitoring wells (GW-15, GW-22, and GW-26).

#### Pole Canyon 2013 NTCRA Effectiveness Monitoring and Performance Evaluation (Cover System)

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- Respond to Agency comments and/or finalize *EMP Revision No. 5*, depending on Agency feedback on the draft submittal.



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Remedial Investigation/Feasibility Study

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- Establish initial steady state operation Phase 2 UF/RO+FBR treatability pilot and begin system monitoring in accordance with the sampling and analysis plan.
- Revise the FS Tech Memo #1 if comments are received from the agencies.

Please contact me if there are questions regarding this submittal.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey D. Hamilton".

Jeffrey Hamilton  
Environmental Engineer

Cc:

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